

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:19-CR-00229-SO
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
)	
vs.)	
)	
MICHAEL DAVID MILLER)	<u>UNOPPOSED MOTION FOR</u>
)	<u>PERMISSION TO TRAVEL</u>
Defendant.)	
)	

Now comes the Defendant, Michael David Miller, by and through counsel, and respectfully requests that this Honorable Court enter an Order permitting him to travel throughout the dates of December 31, 2019 until January 3, 2020. Counsel for the United States and Mr. Miller's probation officer have been consulted regarding this Motion and they do not oppose the Court granting said Motion.

A Memorandum in support is attached hereto and incorporated herein.

Respectfully submitted,

/s/ Roger M. Synenberg
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CLARE C. MORAN (0081134)
MATTHEW A. KURZ (0097941)
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MEMORANDUM

On April 9, 2019 Defendant Michael Miller was indicted and charged with one count of Transmission of Threat in Interstate Commerce in violation of 18 U.S.C. § 875(c). On May 2, 2019, as an additional condition of his release, Mr. Miller was restricted from traveling to locations other than the Northern District of Ohio and the District of Colorado without the Court's permission.

Mr. Miller's sentencing in the above caption case had been set for December 30, 2019 at 2:30 PM. On December 10, 2019, this Honorable Court advised that Mr. Miller's sentencing will be moved either to January 2, 2020 or January 3, 2020. On December 11, 2019, counsel for the United States advised that both proposed dates were acceptable. On the same day, it was proposed by defense counsel that Mr. Miller's sentencing be moved to January 3, 2020.

With the date of his sentencing tentatively set for January 3, 2020, Mr. Miller is seeking to travel alongside his family out of the District of Colorado on December 31, 2019 with his eventual destination being Cleveland, Ohio on January 3, 2020. The reason for this request is that Mr. Miller's grandfather is celebrating his 90th birthday in Danbury, Wisconsin.

Mr. Miller's itinerary would be to fly out of Colorado on December 31, 2019 and arrive in Minneapolis, Minnesota on the same day. Mr. Miller and his parents would then rent a vehicle and drive to Danbury, Wisconsin where his grandfather resides. At the conclusion of their visit, Mr. Miller and his family would drive back to Minneapolis, and then fly to Cleveland, Ohio on January 2, 2020 and await sentencing in the above captioned matter on January 3, 2020.

Counsel for the United States Government as well as Mr. Miller's probation officer have been consulted regarding this request. Neither party opposes the court granting Mr. Miller's request to travel.

WHEREFORE, Defendant Michael Miller respectfully requests permission to travel out of the District of Colorado from December 31, 2019 through January 3, 2020.

Respectfully submitted,

/s/ Roger M. Synenberg
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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular US mail. Parties may access this filing through the Court's system.

s/Roger M. Synenberg
ROGER M. SYNENBERG